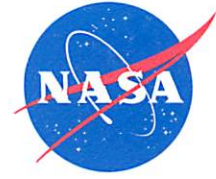


National Aeronautics and Space Administration  
Kennedy Space Center  
Kennedy Space Center, FL 32899



April 5, 2011

Reply to Attn of: CC-A

TO: Distribution

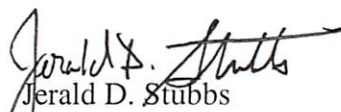
FROM: CC/Chief Counsel

SUBJECT: National Space Club Debus Awards Dinner, April 16, 2011

The Florida Committee of the National Space Club, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host the Dr. Kurt H. Debus Awards Dinner at the Debus Center at the KSC Visitor Complex on Saturday, April 16, 2011. This annual award was created by the National Space Club Florida Committee to recognize a person who has made a particularly important contribution to U.S. aerospace efforts while working in Florida. The award is named for KSC's first Director, Dr. Kurt H. Debus. Jerry Jamison, Vice President, Launch Operations, United Launch Alliance, is the recipient of the 2010 Debus Award. Approximately 270 guests are expected to attend the Awards Dinner. These guests include corporate executives, representatives of aerospace contractors and other organizations, members of academia and representatives of state and Federal government. The approximate value of the dinner is \$75 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in attendance at this event. The dinner will provide employees the opportunity to demonstrate NASA's support of this program which recognizes noteworthy space-related efforts in Florida. In addition, this event is a forum for employees to discuss matters of interest to NASA with a diverse group of fellow attendees interested in our activities. It is in the Government's best interest for employees to attend the dinner as representatives of NASA. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event.

NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.

  
Jerald D. Stubbs  
Agency Designee

Distribution:  
STD-L-A -